

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO

Debtor<sup>1</sup>

CIVIL NO.: 17-BK-03283 (LTS)

PROMESA

TITLE III

**RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE ONE  
HUNDRED FIFTIETH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF  
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO  
TO MISCELLANEOUS DEFICIENT CLAIMS  
[ECF NO. 9943]**

**TO THE HONORABLE COURT:**

**COMES NOW** creditor **Aidza E. Ortiz Feliciano**, through the undersigned counsel, and respectfully responds in opposition to the One Hundred and Fiftieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [ECF No. 9943] “the Objection”), and states and prays as follows:

1. The Commonwealth of Puerto Rico (“Debtor”) has objected to creditor Aidza E. Ortiz Feliciano’s timely filed proof of claim, Prime Clerk Claim No. 161280, as deficient.

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Aidza E. Ortiz Feliciano has filed a valid proof of claim pertaining to unpaid salaries claimed on her own behalf as a qualifying teacher who worked for the debtor's Department of Education from August 19<sup>th</sup>, 1981 to December 21<sup>st</sup>, 2013.

3. This claim is related to the state law number 89 of 1979, commonly known as "Romerazo Law" and "Ley de Retribución Uniforme", a law that was approved in 1979 to increase the salaries of all qualifying teachers working for the Department of Education.

4. The quantity of the claim is undefined because this information is in possession of the debtor, who has the responsibility to calculate the salary increase steps owed to the creditor and who keeps the creditor's official employee file. The salary increase calculations are a highly technical issue that the debtor has modified in state courts, at the collective bargaining table and at administrative levels along the years, before filing the present case 17-BK-03283.

5. The creditor accompanies additional documents that sustain her claim. The best evidence as previously stated is in possession of the debtor.

6. In relation to Debtor's Objection No. 184, Prime Clerk Claim No. 161280, Aidza E. Ortiz Feliciano moves the Court to deny Debtor's objection.

7. Aidza E. Ortiz Feliciano expressly reserves any rights in connection therewith and request that, the non-substantive disallowance requested by Debtor should not prejudice Aidza E. Ortiz Feliciano's rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

**I HEREBY CERTIFY** that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record, and served a copy of the same via e-mail to Counsel for the Oversight Board and to the Creditors' Committee.

In Hormigueros, Puerto Rico, on this 18<sup>th</sup> day of February 2020.

**s/ María Herminia Cotto-Nieves**

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